

The Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

V.

AMAZON.COM, INC., *et al.*,

## Defendants.

No. 2:23-cv-0932-JHC

**STIPULATION AND [PROPOSED]  
ORDER REGARDING CROSS-  
MOTIONS FOR PROTECTIVE  
ORDER**

**NOTE ON MOTION CALENDAR:  
January 24, 2024**

## STIPULATED MOTION

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed Order set forth below, which permits a party resisting a motion to compel discovery to do so without any requirement that it file a separate cross-motion for a protective order.

In support of this request, the parties represent the following to the Court:

1. The parties are in ongoing negotiations regarding discovery issues.

2. The parties agree that if, despite their best efforts, judicial intervention is needed to resolve their disputes, they would like to make the process as efficient as possible for the Court and parties.

3. To further this goal, the parties agree that a party resisting a motion to compel discovery may, at the party's election, oppose the motion to compel in an opposition brief without the need to file a cross-motion for a protective order.

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REGARDING CROSS-MOTIONS FOR PROTECTIVE ORDER  
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Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main • 206.757.7700 fax

4. Accordingly, the parties stipulate as follows and jointly request that the Court enter the following order approving that stipulation:

- a. A cross-motion for a protective order will not be required from any party to fully resist a motion to compel without waiving any rights or privileges.
- b. Any party at its election may also affirmatively move or cross-move for a protective order pursuant to LCR 7(k) should it choose to do so.

Stipulated to and respectfully submitted this 24th day of January, 2024, by:

DAVIS WRIGHT TREMAINE LLP  
*Attorneys for Defendants*

By s/ Kenneth E. Payson

Kenneth E. Payson, WSBA #26369  
James Howard, WSBA #37259  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 622-3150  
Fax: (206) 757-7700  
E-mail: [kenpayson@dwt.com](mailto:kenpayson@dwt.com)  
[jimhoward@dwt.com](mailto:jimhoward@dwt.com)

COVINGTON & BURLING LLP

Stephen P. Anthony\*  
Laura Flahive Wu\*  
Laura M. Kim\*  
John D. Graubert\*  
850 Tenth Street, NW  
Washington, DC 20001  
Telephone: (206) 662-5105  
E-mail: [santhony@cov.com](mailto:santhony@cov.com)  
[lflahivewu@cov.com](mailto:lflahivewu@cov.com)  
[lkim@cov.com](mailto:lkim@cov.com)  
[jgraubert@cov.com](mailto:jgraubert@cov.com)

John E. Hall\*  
415 Mission Street, Suite 5400  
San Francisco, CA 94105  
Telephone: (415) 591-6855  
E-mail: [ihall@cov.com](mailto:ihall@cov.com)

Megan L. Rodgers\*  
3000 El Camino Real  
Palo Alto, CA 94306  
Telephone: (650) 632-4734  
E-mail: mrodgers@cov.com

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Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main • 206.757.7700 fax

1 HUESTON HENNIGAN LLP  
2

3 John C. Hueston\*  
4 Moez M. Kaba\*  
5 Joseph A. Reiter\*  
6 523 West 6th Street, Suite 400  
7 Los Angeles, CA 90014  
8 Telephone: (213) 788-4340  
9 E-mail: [jhueston@hueston.com](mailto:jhueston@hueston.com)  
10 [mkaba@hueston.com](mailto:mkaba@hueston.com)  
11 [jreiter@hueston.com](mailto:jreiter@hueston.com)

12 \**Admitted pro hac vice*

13 *Approved and Agreed To By:*

14 FEDERAL TRADE COMMISSION  
15 *Attorneys for Plaintiff*

16 By s/ Thomas Maxwell Nardini  
17 Evan Mendelson, D.C. Bar #996765  
18 Olivia Jerjian, D.C. Bar #1034299  
19 Thomas Maxwell Nardini, IL Bar  
#6330190  
20 600 Pennsylvania Avenue NW  
21 Washington, DC 20580  
22 (202) 326-3320; [emendelson@ftc.gov](mailto:emendelson@ftc.gov)  
23 (202) 326-2749; [ojerjian@ftc.gov](mailto:ojerjian@ftc.gov)  
24 (202) 326-2812; [tnardini@ftc.gov](mailto:tnardini@ftc.gov)

25 Colin D. A. McDonald, WSBA # 55243  
26 Federal Trade Commission  
27 915 Second Ave., Suite 2896  
Seattle, WA 98174  
(206) 220-4474; [cmacdonald@ftc.gov](mailto:cmacdonald@ftc.gov)

## ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2024.

**JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE**

Presented By:  
DAVIS WRIGHT TREMAINE LLP  
*Attorneys for Defendant*

By s/ Kenneth E. Payson  
Kenneth E. Payson, WSBA #26369  
James Howard, WSBA #37259  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 622-3150  
Fax: (206) 757-7700  
E-mail: [kenpayson@dwt.com](mailto:kenpayson@dwt.com)  
[jimhoward@dwt.com](mailto:jimhoward@dwt.com)

## COVINGTON & BURLING LLP

Stephen P. Anthony\*  
Laura Flahive Wu\*  
Laura M. Kim\*  
John D. Graubert\*  
850 Tenth Street, NW  
Washington, DC 20001  
Telephone: (206) 662-5105  
E-mail: [santhony@cov.com](mailto:santhony@cov.com)  
[lflahivewu@cov.com](mailto:lflahivewu@cov.com)  
[lkim@cov.com](mailto:lkim@cov.com)  
[jgraubert@cov.com](mailto:jgraubert@cov.com)

John E. Hall\*  
415 Mission Street, Suite 5400  
San Francisco, CA 94105  
Telephone: (415) 591-6855  
E-mail: [jhall@cov.com](mailto:jhall@cov.com)

Megan L. Rodgers\*  
3000 El Camino Real  
Palo Alto, CA 94306  
Telephone: (650) 632-4734  
E-mail: mrodgers@cov.com

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Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
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1 HUESTON HENNIGAN LLP

2 John C. Hueston\*  
3 Moez M. Kaba\*  
4 Joseph A. Reiter\*  
5 523 West 6th Street, Suite 400  
6 Los Angeles, CA 90014  
7 Telephone: (213) 788-4340  
8 E-mail: [jhueston@hueston.com](mailto:jhueston@hueston.com)  
9 [mkaba@hueston.com](mailto:mkaba@hueston.com)  
10 [jreiter@hueston.com](mailto:jreiter@hueston.com)

11 \**Admitted pro hac vice*

12 FEDERAL TRADE COMMISSION  
13 *Attorneys for Plaintiff*

14 *By s/ Thomas Maxwell Nardini*

15 Evan Mendelson, D.C. Bar #996765  
16 Olivia Jerjian, D.C. Bar #1034299  
17 Thomas Maxwell Nardini, IL Bar #6330190  
18 600 Pennsylvania Avenue NW  
Washington, DC 20580  
(202) 326-3320; [emendelson@ftc.gov](mailto:emendelson@ftc.gov)  
(202) 326-2749; [ojerjian@ftc.gov](mailto:ojerjian@ftc.gov)  
(202) 326-2812; [tnardini@ftc.gov](mailto:tnardini@ftc.gov)

19 Colin D. A. McDonald, WSBA # 55243  
20 Federal Trade Commission  
21 915 Second Ave., Suite 2896  
22 Seattle, WA 98174  
23 (206) 220-4474; [cmacdonald@ftc.gov](mailto:cmacdonald@ftc.gov)

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25  
26  
27  
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